

## 510(k) Summary of Safety and Effectiveness

*This summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR 807.92.*

### Introduction

According to the requirements of 21 CFR 807.92, the following information provides sufficient detail to understand the basis for a determination of substantial equivalence.

### Submitter Name, Address, and Contact:

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Contact: Bernice Lin, Ph.D.  
VP Operations

### Device Name and Classification

Classification Name: Enzyme Immunoassay, Oxycodone  
Class II, DJG (91 Toxicology),  
21 CFR 862.3650

Drug Specific Calibrators,  
Class II, DLJ (91 Toxicology),  
21 CFR 862.3200

Drug Specific Controls,  
Class I, LAS (91 Toxicology),  
21 CFR 862.3280

Common Name: Homogeneous Oxycodone Enzyme Immunoassay  
Proprietary Name: LZI Oxycodone Enzyme Immunoassay,  
LZI Oxycodone Drugs of Abuse (DAU) Calibrators  
LZI Oxycodone Drugs of Abuse (DAU) Controls

**Legally Marketed Predicate Device(s)**

The LZI Oxycodone Enzyme Immunoassay (EIA) is substantially equivalent to the Lin-Zhi International, Inc. Oxycodone Enzyme Immunoassay (k050733) manufactured by Lin-Zhi International, Inc. The LZI Oxycodone Enzyme Immunoassay is identical or similar to its predicate in terms of intended use, method principle, device components, and clinical performance.

**Device Description**

The LZI Oxycodone assay is a homogeneous enzyme immunoassay with ready-to-use liquid reagents. The assay is based on competition between drug in the sample and drug labeled with the enzyme glucose-6-phosphate dehydrogenase (G6PDH) for a fixed amount of antibody in the reagent. Enzyme activity decreases upon binding to the antibody, and the drug concentration in the sample is measured in terms of enzyme activity. In the absence of drug in the sample, oxycodone-labeled G6PDH conjugate is bound to antibody, and the enzyme activity is inhibited. On the other hand, when free drug is present in the sample, antibody would bind to free drug; the unbound oxycodone-labeled G6PDH then exhibits its maximal enzyme activity. Active enzyme converts nicotinamide adenine dinucleotide (NAD) to NADH, resulting in an absorbance change that can be measured spectrophotometrically at 340 nm.

The LZI Oxycodone Enzyme Immunoassay is a kit comprised of two reagents, an R<sub>1</sub> and R<sub>2</sub>, which are bottled separately but sold together within the kit.

The R<sub>1</sub> solution contains mouse monoclonal anti-Oxycodone antibody, glucose-6-phosphate (G6P) nicotinamide adenine dinucleotide (NAD), stabilizers, and sodium azide (0.09%) as a preservative. The R<sub>2</sub> solution contains glucose-6-phosphate dehydrogenase (G6PDH) labeled with oxycodone in buffer with sodium azide (0.09%) as preservative.

The LZI Oxycodone Enzyme Immunoassay (k050733) calibrators and controls designated for use at the 100 and 300 ng/mL cutoffs contain 0, 50, 75, 100, 125, 225, 300, 375, 500, and 800 ng/mL of oxycodone in human urine with sodium azide (0.09%) as preservative. These six calibrators and four controls are sold as individual bottles.

## **Intended Use**

The LZI Oxycodone Enzyme Immunoassay is intended for the qualitative and semi-quantitative determination of Oxycodone in human urine at the cutoff values of 100 and 300 ng/mL. The assay is designed for professional use with a number of automated clinical chemistry analyzers.

The semi-quantitative mode is for purposes of (1) enabling laboratories to determine an appropriate dilution of the specimen for confirmation by a confirmatory method such as GCMS and LCMS or (2) permitting laboratories to establish quality control procedures.

The LZI Oxycodone Drugs of Abuse (DAU) Calibrators are for use as calibrators in the qualitative and semi-quantitative calibration of the LZI Oxycodone Enzyme Immunoassay at the cutoff values of 100 and 300 ng/mL.

The LZI Oxycodone Drugs of Abuse (DAU) Controls are for use as assayed quality control materials to monitor the precision of the LZI Oxycodone Enzyme Immunoassay at the cutoff value of 100 and 300 ng/mL.

*The assay provides only a preliminary analytical result. A more specific alternative chemical method must be used in order to obtain a confirmed analytical result. Gas or liquid chromatography/mass spectrometry (GC/MS or LC/MS) is the preferred confirmatory method. Clinical consideration and professional judgment should be exercised with any drug of abuse test result, particularly when the preliminary test result is positive.*

### Comparison to Predicate Device

The LZI Oxycodone Enzyme Immunoassay is substantially equivalent to the Lin-Zhi International, Inc. Oxycodone Enzyme Immunoassay, Calibrators and Controls for Hitachi 717 Systems cleared by the FDA under the premarket notification k050733 for its stated intended use.

The following table compares LZI's Oxycodone Enzyme Immunoassay with the predicate device.

Device Characteristics	Subject Device LZI Oxycodone Enzyme Immunoassay, Calibrators and Controls	Predicate Device (k050733) LZI Oxycodone Enzyme Immunoassay, Calibrators and Controls
<b>Intended Use</b>	<p>The LZI Oxycodone Enzyme Immunoassay, when used in conjunction with Hitachi 717 automated clinical system analyzers, is intended for the qualitative and semi-quantitative determination of oxycodone and oxymorphone in human urine at cutoff values of 100 or 300 ng/mL. The assay is designed for professional use with a number of automated clinical chemistry analyzers.</p> <p><i>This assay provides a rapid screening procedure for determining the presence of oxycodone and oxymorphone in urine. The assay provides only a preliminary analytical result. A more specific alternative chemical method must be used in order to obtain a confirmed analytical result. Gas or liquid chromatography/mass spectrometry (GC/MS or LC/MS) is the preferred confirmatory method. Clinical consideration and professional judgment should be exercised with any drug of abuse test result, particularly when the preliminary test result is positive.</i></p>	<p>The LZI Oxycodone Enzyme Immunoassay, when used in conjunction with Hitachi 717 automated clinical system analyzers, is intended for the qualitative and semi-quantitative determination of oxycodone and oxymorphone in human urine at cutoff values of 100 or 300 ng/mL. The assay is designed for professional use with a number of automated clinical chemistry analyzers.</p> <p><i>This assay provides a rapid screening procedure for determining the presence of oxycodone and oxymorphone in urine. The assay provides only a preliminary analytical result. A more specific alternative chemical method must be used in order to obtain a confirmed analytical result. Gas or liquid chromatography/mass spectrometry (GC/MS or LC/MS) is the preferred confirmatory method. Clinical consideration and professional judgment should be exercised with any drug of abuse test result, particularly when the preliminary test result is positive.</i></p>
<b>Analyte</b>	Oxycodone	Oxycodone
<b>Cutoff</b>	100 or 300 ng/mL	100 or 300 ng/mL
<b>Matrix</b>	Urine	Urine
<b>Calibrators Level</b>	0, 50, 100, 300, 500, and 800 ng/mL	100 ng/mL Cutoff: 5 Levels (0, 75, 100, 225, 300 ng/mL) 300 ng/mL Cutoff: 5 Levels (0, 100, 300, 500, 800 ng/mL)
<b>Controls Level</b>	100 ng/mL Cutoff: 2 Levels (75 ng/mL, 125 ng/mL) 300 ng/mL Cutoff: 2 Levels (225 ng/mL, 375 ng/mL)	100 ng/mL Cutoff: 2 Levels (75 ng/mL, 125 ng/mL) 300 ng/mL Cutoff: 2 Levels (225 ng/mL, 375 ng/mL)
<b>Storage</b>	2-8 °C until expiration date	2-8 °C until expiration date

## Performance Characteristics Summary: 100 ng/mL Cutoff

### Hitachi 717 Analyzer

#### Precision: 100 ng/mL Cutoff

##### Semi-Quantitative Positive/Negative Results:

100 ng/mL Cutoff Result:		Within Run		Total Precision	
Sample Concentration	% of Cutoff	Number of Determination	Immunoassay Result	Number of Determination	Immunoassay Result
0 ng/mL	-100.0%	22	22 Negative	88	88 Negative
25 ng/mL	-75.0%	22	22 Negative	88	88 Negative
50 ng/mL	-50.0%	22	22 Negative	88	88 Negative
75 ng/mL	-25.0%	22	22 Negative	88	88 Negative
100 ng/mL	100.0%	22	9 Pos/13 Neg	88	39 Pos/49 Neg
125 ng/mL	+25.0%	22	22 Positive	88	88 Positive
150 ng/mL	+50.0%	22	22 Positive	88	88 Positive
175 ng/mL	+75.0%	22	22 Positive	88	88 Positive
200 ng/mL	+100.0%	22	22 Positive	88	88 Positive

##### Qualitative Positive/Negative Results:

100 ng/mL Cutoff Result:		Within Run		Total Precision	
Sample Concentration	% of Cutoff	Number of Determination	Immunoassay Result	Number of Determination	Immunoassay Result
0 ng/mL	-100.0%	22	22 Negative	88	88 Negative
25 ng/mL	-75.0%	22	22 Negative	88	88 Negative
50 ng/mL	-50.0%	22	22 Negative	88	88 Negative
75 ng/mL	-25.0%	22	22 Negative	88	88 Negative
100 ng/mL	100.0%	22	6 Pos/ 16 Neg	88	25 Pos/63 Neg
125 ng/mL	+25.0%	22	22 Positive	88	88 Positive
150 ng/mL	+50.0%	22	22 Positive	88	88 Positive
175 ng/mL	+75.0%	22	22 Positive	88	88 Positive
200 ng/mL	+100.0%	22	22 Positive	88	88 Positive

#### Precision: 300 ng/mL Cutoff

##### Semi-Quantitative Positive/Negative Results:

300 ng/mL Cutoff Result:		Within Run		Total Precision	
Sample Concentration	% of Cutoff	Number of Determination	Immunoassay Result	Number of Determination	Immunoassay Result
0 ng/mL	-100.0%	22	22 Negative	88	88 Negative
75 ng/mL	-75.0%	22	22 Negative	88	88 Negative
150 ng/mL	-50.0%	22	22 Negative	88	88 Negative
225 ng/mL	-25.0%	22	22 Negative	88	88 Negative
300 ng/mL	100.0%	22	3 Pos/ 19 Neg	88	26 Pos/ 62 Neg
375 ng/mL	+25.0%	22	22 Positive	88	88 Positive
450 ng/mL	+50.0%	22	22 Positive	88	88 Positive
525 ng/mL	+75.0%	22	22 Positive	88	88 Positive
600 ng/mL	+100.0%	22	22 Positive	88	88 Positive

**Precision: 300 ng/mL Cutoff Continued**  
**Qualitative Positive/Negative Results:**

300 ng/mL Cutoff Result:		Within Run		Total Precision	
Sample Concentration	% of Cutoff	Number of Determination	Immunoassay Result	Number of Determination	Immunoassay Result
0 ng/mL	-100.0%	22	22 Negative	88	88 Negative
75 ng/mL	-75.0%	22	22 Negative	88	88 Negative
150 ng/mL	-50.0%	22	22 Negative	88	88 Negative
225 ng/mL	-25.0%	22	22 Negative	88	88 Negative
300 ng/mL	100.0%	22	1 Pos/21 Neg	88	23 Pos/65 Neg
375 ng/mL	+25.0%	22	22 Positive	88	88 Positive
450 ng/mL	+50.0%	22	22 Positive	88	88 Positive
525 ng/mL	+75.0%	22	22 Positive	88	88 Positive
600 ng/mL	+100.0%	22	22 Positive	88	88 Positive

**Performance Characteristics Summary:**  
**100 & 300 ng/mL Cutoff**

**Hitachi 717 Analyzer**

**Linearity: 100 & 300 ng/mL Cutoff**

Hitachi 717 Instrument: 0 - 800 ng/mL

When comparing the result (y) and target (x) value, using the least squares regression technique, the regression equation and correlation are as follows:

$$y = 0.974x + 1.4518, r^2 = 0.998$$

**Method Comparison - Clinical Samples: 100 ng/mL Cutoff**

From a total of eighty-nine (89) clinical unaltered samples:

Semi-Quantitative & Qualitative Data: 93.75% agreement with positive, 100.0% agreement with negative samples

**Method Comparison - Clinical Samples: 300 ng/mL Cutoff**

From a total of one-hundred and one (101) clinical unaltered samples:

Semi-Quantitative & Qualitative Data: 96.1% agreement with positive, 98.0% agreement with negative samples

**Endogenous Compound Interference & Specificity & Cross-Reactivity:**

No significant undesired cross-reactants or endogenous substance interference was observed.

**Summary:**

The information provided in this pre-market notification demonstrates that the LZ1 Oxycodone Enzyme Immunoassay is substantially equivalent to the legally marketed predicate device for its general intended use. Substantial equivalence was demonstrated through comparison of intended use and physical properties to the commercially available predicate device as confirmed by chromatography/mass spectrometry (GC/MS

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or LC/MS), an independent analytical method. The information supplied in this pre-market notification provides reasonable assurance that the LZI Oxycodone Enzyme Immunoassay is safe and effective for its stated intended use.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration

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Silver Spring, MD 20993

Lin-Zhi International, Inc  
c/o Bernice Lin, Ph.D.  
670 Almanor Avenue  
Sunnyvale, CA 94085

JUN - 1 2012

Re: k120763  
Trade Name: LZI Oxycodone Enzyme Immunoassay  
LZI Oxycodone Drugs of Abuse (DAU) Calibrators,  
LZI Oxycodone Drugs of Abuse (DAU) Controls  
Regulation Number: 21 CFR §862.3650  
Regulation Name: Opiate test system  
Regulatory Class: Class II  
Product Codes: DJG, DLJ, LAS  
Dated: April 27, 2012  
Received: April 30, 2012

Dear Dr. Lin:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. In addition, FDA may publish further announcements concerning your device in the Federal Register.

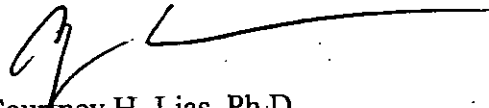
Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820).



If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of In Vitro Diagnostic Device Evaluation and Safety at (301) 796-5450. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (301) 796-5760. For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance...

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-5680 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>

Sincerely yours,



Courtney H. Lias, Ph.D.  
Director  
Division of Chemistry and Toxicology Devices  
Office of *In Vitro* Diagnostic Device  
Evaluation and Safety  
Center for Devices and Radiological Health

Enclosure

**Premarket Notification****Indications for Use Statement**510(k) Number (if known): K120763Device Name: **LZI Oxycodone Enzyme Immunoassay****Indications for Use:**

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Prescription Use ✓ AND/OR Over-The-Counter Use \_\_\_\_\_  
(Part 21 CFR 801 Subpart D) (21 CFR 807 Subpart C)

Concurrence of CDRH, Office of In Vitro Diagnostic Devices (OIVD)  
(Per 21 CFR 801.109)



Division Sign-Off

Office of In Vitro Diagnostic  
Device Evaluation and Safety510(k) K120763